

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LINDA LEONARD,

Defendant.

3 : 07 cr 0190

INFORMATION
29 U.S.C. § 439(c)
(Class A Misdemeanor)

MICHAEL R. MERZ

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE
[29 U.S.C. § 439(c)]

1. At all times relevant to this Information, the Laborers' International Union of North America, Local 216 (LIUNA Local 216") was a labor organization engaged in an industry affecting commerce within the meaning of Sections 402(i) and 402(j) of Title 29, United States Code.

2. On or about February 10, 2005, within the Southern District of Ohio, the defendant, LINDA LEONARD, did wilfully make and cause to be made a false entry in a record required to be kept by Section 436 of Title 29, United States Code, that is, the duplicate dues receipt for a union member, identified herein as K.B., in LIUNA Local 216's duplicate receipt book for that time period, which is a record on matters required to be reported in the annual financial report of the LIUNA Local 216.

GREGORY G. LOCKHART
United States Attorney



VIPAL J. PATEL
Deputy Chief, Criminal Division